



# PARTNERSHIP FOR SUSTAINABLE OCEANS

Recreational Fishermen Protecting California's Ocean Resources

November 19, 2007

The Honorable Susan Golding, Chair  
MLPA Initiative Blue Ribbon Task Force  
c/o California Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

RE: Public Comments at November 19, 2007 BRTF Meeting

Dear Mayor Golding and fellow BRTF Members:

Thank you for the opportunity to provide comments today. My name is Patty Doerr, director of Ocean Resource Policy for the American Sportfishing Association (ASA). I am here representing the Partnership for Sustainable Oceans (PSO). Our partners in the PSO are Coastside Fishing Club, United Anglers of Southern California, Sportfishing Association of California, Southern California Marine Association, National Marine Manufacturing Association, and NorCal Kayak Anglers.

As you are aware, ASA and our partners in the PSO have been actively and constructively engaged in the implementation process for the second phase of the MLPA Initiative. We have had good communications with MLPA Initiative staff, who have been very responsive to addressing our concerns. Our goal is to participate in an open, scientifically-based process that results in the BRTF recommending to the Fish and Game Commission a series of marine protected areas that provide for the protection of California's ocean resources without unnecessary closures to recreational fishing.

My comments today arise from the November 13, 2007 meeting of the Science Advisory Team (SAT). Please know that based on information garnered and decisions made at the meeting, the PSO will be making the necessary adjustments in the Marine Resources Protection Plan, or external option B, to ensure that it satisfies the requirements of the MLPA.

At the SAT meeting there was substantial discussion regarding two related topics; the "level of protection" and amount of by-catch associated with salmon trolling – specifically the science documenting by-catch rates; and the value of different area types. A policy decision for the BRTF is whether no-take reserves should inherently receive a higher value than any other area type even if they result in identical ecosystem conditions.

We agree with the DFG member of the SAT, Mr. John Ugoretz, who, along with several members of the SAT stated that this is a policy decision to be decided by the BRTF and we appreciate the SAT decision to move the discussion to the BRTF. Our recommendation is that the SAT should make the decision objectively based on the actual conservation level such as a score of 10, 8, 6 and so forth. This removes making a decision based on a subjective judgment that one type of area may be more valuable than another.

The SAT voted at that meeting to assign salmon fishing a "high", or an "8," level of protection if the marine conservation area is deeper than 50 meters and a "6", or "moderately-high" level of protection if the area is less than 50 meters in depth. The DFG's by-catch data presented to the SAT was clear and overwhelmingly supports the conclusion that the limited by-catch associated with the salmon troll fishery is insignificant and does not result in any difference in ecosystem health. The PSO supports the recommendation by SAT member Dr. Ray Hilborn to list all salmon trolling as an activity that results in a "very high" level of protection (10).

The MLPA calls for the use of "the best readily available science." Given the available DFG data which states that commercial salmon trollers have a by-catch measurement of two pounds/square kilometer a year, absent contrary science, there is no scientific basis for the SAT to attribute a lower level of protection to salmon trolling. In 2006, Field et al<sup>1</sup> estimated that the abundance of rockfish and other species that are likely salmon by-catch in the California Current ecosystem was approximately 26,000 kg/square kilometers in 1960. Allowing for a fifty-percent depletion rate, the current abundance could be estimated to be about 13,000 kg/square kilometers. Even if the by-catch data is greater than two pounds/square kilometer a year in specific areas, it would still be an insignificant proportion of the standing stock. Again, science indicates that salmon trolling has an insignificant impact on the ocean ecosystem and should therefore be given a very high level of protection.

Also in relation to the SAT deliberations, the PSO also requests that the BRTF consider directing the SAT to use a pass/fail system when determining whether

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<sup>1</sup>Field, J. C., Francis, R. C., and Aydin, K. 2006. Top-down modeling and bottom-up dynamics: Linking a fisheries-based ecosystem model with climate. *Progress in Oceanography*. 68: 238-270

or not MPA proposals meet SAT guidelines. And any MPA receiving a "moderately-high", or "6", level of protection should be considered as meeting those guidelines. The PSO strongly believes that an MPA with at least a moderately-high level of protection would more than adequately meet the conservation goals of the MLPA. It should then be left to the BRTF to consider not only the science guidelines, but also the economic and social values of the proposals when deciding on its recommendations to the Fish and Game Commission.

Thank you again for the opportunity to speak with you this morning. I believe that Dan Wolford with Coastsides Fishing Club, Ben Sleeter, and Bob Osborn with United Anglers of Southern California will also be providing some remarks on behalf of the PSO to address some of the science issues in more detail.

We are available to answer any questions you may have.

Sincerely,

A handwritten signature in dark ink, appearing to read "Patricia A. Doerr", with a long horizontal flourish extending to the right.

Patricia A. Doerr  
Ocean Resource Policy Director  
American Sportfishing Association

cc: California Fish and Game Commission

Partnership for Sustainable Oceans: American Sportfishing Association, Coastsides Fishing Club, United Anglers of Southern California, Sportfishing Association of California, Southern California Marine Association, National Marine Manufacturers Association, and NorCal Kayak Anglers